

Sage Legal LLC

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September 12, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Vera M. Scanlon, U.S.M.J.
225 Cadman Plaza East
Courtroom 13A South
Brooklyn, NY 11201-1804

Re: Netles v. Zoom 34 LLC, et al.
Case No.: 1:25-cv-334 (CBA) (MMH)

Dear Judge Scanlon:

This firm represents the Defendant Zoom 34 LLC (“Defendant”) in the above-referenced case. The Defendant writes to respectfully request an extension of time, until today, September 12, 2025, to respond to the amended complaint filed by Plaintiff in this case.

Pursuant to ¶ 2(D) of this Court’s Individual Motion Practices, Defendant respectfully submits that:

- (i) the original deadline to respond to the complaint, according to the docket sheet, was August 6, 2025 pursuant to ¶ 15(a)(3) of the Federal Rules of Civil Procedure;
- (ii) there was no previous request for an extension of this deadline;
- (iii) Plaintiff consents to this requested extension of time;
- (iv) Defendant submits that good cause exists based on counsel’s travels during August 1, 2025 through August 5, 2025 and August 21, 2025 through September 2, 2025, resulting in the need for additional time to analyze the amended pleadings and prepare an appropriate response to the operative complaint;

In light of the foregoing, Defendant respectfully submits that sufficient good cause and excusable neglect exists for this Court to exercise its discretion in favor of granting the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(B).

Defendant thanks this Court for its time and attention to this case.

Dated: Jamaica, New York
September 12, 2025

Respectfully submitted,

SAGE LEGAL LLC

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